Page 1 Page 2 IN THE UNITED STATES DISTRICT COURT APPEARANCES EASTERN DISTRICT OF ARKANSAS WESTERN DIVISION ON BEHALF OF PLAINTIFFS: JOHN WALKER, ESQUIRE JENNIFER BEASLEY; DR. KIFFANY JOY SPRINGER, Administrative Assistant PRIDE; LAURA SHIRLEY; and John Walker Law Firm NICOLE TOWNSEND, 1723 South Broadway Street PLAINTIFFS, Little Rock, Arkansas 72206 VS NO. 4:18-cv-508-DPM ON BEHALF OF DEFENDANTS: DR. CHARLES MCNULTY, in his official W. CODY KEES, ESQUIRE capacity as Superintendent of Schools Bequette, Billingsley and Kees of the Pulaski County Special School District; PULASKI COUNTY SPECIAL SCHOOL 425 West Capitol Avenue DISTRICT BOARD OF DIRECTORS; and **Suite 3200** PULASKI COUNTY SPECIAL SCHOOL DISTRICT, Little Rock, Arkansas 72201 a public body corporate, DEFENDANTS. ALSO PRESENT: MS. SHAWN BURGESS ---0------0---**DEPOSITION** OF KIFFANY PRIDE ---0---THURSDAY, OCTOBER 24, 2019 2 ---0---Page 3 Page 4 INDEX 1 The deposition of Kiffany Pride was 2 taken before me, Debbye L. Petre, Certified Court WITNESS: PAGE: 3 Reporter and notary public within and for the County 4 of Pulaski, State of Arkansas, duly commissioned and KIFFANY PRIDE 5 acting, on Thursday, October 24, 2019, beginning at Direct Examination..... 6 the hour of 12:30 p.m., at the offices of John Walker 7 Law Firm, 1723 South Broadway, Little Rock, Pulaski ---0---8 County, Arkansas. EXHIBITS 9 Said deposition being taken in 10 accordance with the Rules of Federal Procedure and (None marked.) 11 pursuant to the provisions of the Arkansas Rules of 12 Civil Procedure at instance of counsel for the 13 Defendant in the above-styled case in the United ---0---14 States District Court, Eastern District of Arkansas, Reporter's Certificate.... 15 Western Division. 16 ---0---17 THEREUPON, the following proceedings were had, 18 to-wit: 19 ---0---20 **EXHIBIT** 3

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Page 5 1 PROCEEDINGS 2 WHEREUPON. 3 KIFFANY PRIDE, 4 having been called for examination, and having been 5 first duly swom, was examined and testified as 6 follows: 7 DRECT EXAMINATION 8 BY MR. KEES: 9 Q Would you state your name for the record, ma'am? 10 A Kiffany Pride. 11 Q All'pikh. And what is your middle name. Doctor 12 Pride? 13 A Rochell. Q And where do you live? 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 3101 Louistana, Little Rock. 17 Q Wat is your defense? 18 Q Okay. And you work for the department? 19 A Yes. 20 Q What is your obtion there? 21 A Director of Curriculum and Assessment. 22 Q And have you over given a deposition before? 23 A No, not that I can remember. 24 Q I think you attended — 25 A I attended. 26 Q It's highly unlikely it's a straight \$92,000.00. 27 A Is a L2-month contract. 28 Q Okay. Of what? 29 Q Okay. Of what? 30 A Ves. 40 Q Okay. Of what? 41 A Is a 12-month contract. 41 A Is a 12-month contract. 41 A Is a Starte Personnel Development grant. 42 Q Twelver months. You get holidays, and you get, what, to paid days a year? 41 A Is a started this, by a underse was the district word. 42 Q Twelver months. You get holidays, and you get, what, to paid days a year? 43 A Uh-luh. A vescation day a month. 44 Q Twelver months. You get holidays, and you get, what, to paid days a year? 45 Q Okay. So, your morrorewal at the district word. 46 Q Twelver months. You get holidays, and you get, what, to paid days a year? 47 A Uh-luh. A vescation day a month. 48 Q Okay. So, your morrorewal at the district word. 49 Q Okay. So, your morrorewal at the district word. 40 Q Okay. So, your morrorewal at the district word. 41 Q Okay. So, your morrorewal at the district word. 42 Q Okay. So, your morrorewal at the district word. 43 Q Okay. So, your morrorewal at the district word. 44 Q Okay. So, your morrorewal at the district word. 45 Q Okay. So, your morrorewal at the district word. 46 Q Okay. So, your morrorewal at the district word. 47 Q Okay. So, your morrorewal at the	1			
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3	1		1	Q You attended the depositions of Doctor Remele and
4 having been called for examination, and having been 5 first duly swom, was examined and testified as 6 follows: 7 DIRECT EXAMINATION 8 BY MR, KEES: 9 Q Would you state your name for the record, marking? 10 A Kiffany Pride. 11 Q All right. And what is your middle name, Doctor 12 Pride? 13 A Rockelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisiana, Little Rock. 18 Q Okay. And you werk for the department? 19 A Yes. 10 Q What is your position there? 20 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q And have you ever given a deposition before? 23 A No, not that I can remember. 24 Q I think you attended — 25 A I attended. 26 Q I she in think you werk down what your past is there? 27 A No. I think it is straight \$92,000.00. 28 Q \$92,000.00? 29 Q \$92,000.00? 30 A Yes. 40 Q If sh jighly unlikely it's a straight \$92,000.00. 41 A Yes, 42 Q I sh jist started this job August the 8th. 42 Q I sh was the recommender. 43 A Okay. Or what? 44 A Un-huh. (Indicated yes.) 45 Q Noy. Or what? 46 A Correct, to my best recollection of that date. 47 A Jist started this job August the 8th. 48 Q Roy, Or what? 49 A Of this year, 2019. 40 A Ves. 41 A I start was your for for ilearce, and the district went of the destrict went of the cooperative, bridge, and the district went of the start Personnel Development grant. 40 Q Nown Okay. Or what? 41 A Un-huh. (and icated yes.) 42 Q Do you report to there? 43 A Okay. Or what? 44 A Yes, after that date. So, yeah, Yes. 45 Q Do what? 46 A Sinch is an antification of that date. 47 Yes, after that date. So, yeah, Yes. 48 Q I Sh jiet yurikely it's a straight \$92,000.00. 49 A Yes. 40 Q Nown Okay. Or what? 41 A I said, I don't know the exact days, but excluding holidays. 41 A Un-huh. (Indicated presonnel Development grant. 42 Q Oh, Grean Rivers. Okay. So, did you go over to there's a number. But if so 12-month. 49 A Un-huh. A vacation day a month. 40 Q Nows. Okay. So, jour porntrol boctor Atwell? 40 Q Nows. So, your positio	2	WHEREUPON,	2	McNulty?
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follows: DIRECT EXAMINATION BY MR. KEIS: Q Would you state your name for the record, ma'am? A Kiffany Pride. Q Mould you state your middle name, Doctor Pride? A Rochelle. Q And what is your middle name, Doctor Pride? A Rochelle. Q And where do you live? A In Little Rock. Q Man is your address? A Casy. A 1301 Louisiana, Little Rock. Q Okay. And you work for the department? A 1301 Louisiana, Little Rock. Q Okay. And you work for the department? A Yes. Q What is your gostition there? A No, Tothat I can remember. Q And have you ever given a deposition before? Q I think you attended. Q So, Down the coact change. Q I think you attended. Q So, Own on that I can remember. Q So, Own on that I can remember. Q Soy 2000 00? A No, I think it is straight \$92,000.00. A No, I think it is. Q Okay. On yow. Okay. And how many months is that? A I glist started this job August the 8th. Q Okay. Oryhat? A I list started this job August the 8th. Q Okay. Oryhat? A I list started this job August the 8th. Q Okay. Oryhat? A I late and the want days, but excluding holidays. A I laten the cancel change. A I laten the cancel change. A No, I think it is. A I don't know the exact days, but excluding holidays. A I laten for this year, 2019. Q Do what? A I laten for this year, 2019. Q Do what? A I laten for this year, 2019. Q Do what? A I laten for this year. Q Own was that the district was only one or the state Personnel Development grant. A I loon't know the exact days, but excluding holidays. A I loon't know the exact days. I'm sure there's a number. But it's a 12-month contract. Q Twelver outs. You get holidays, and you get, what, ten paid days a year? A Uh-huh, Yeah. So no. You accuse vacation days. So, 12. Q Twelver Oxay. So, your montract want the district went. A No. So, twest is an infinite number. A No. So, your nonrenewal at the district went. A No. So, twest is an infinite number. A No. So, twelve since the freest an infinite number. A No. So, twelve since the freestate Personnel Development grant. C Okay. Or welver. A Uh-huh, Ye	4	having been called for examination, and having been	4	Q So, just briefly, I'm just going to ask you some
BYM R. KES: 9 Q Would you state your mame for the record, malane? 10 A Kiffany Pride. 11 Q All right. And what is your middle name. Doctor 12 Pride? 13 A Rochelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisland, Little Rock. 18 Q Okay. And you work for the department? 19 Q All right is uncompared to the first of the season of Corricultum and Assessment. Who do you report to there? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisland, Little Rock. 18 Q Okay. And you work for the department? 19 A Yes. 19 Q What is your position there? 20 Q What is your position there? 21 A Director of Curricultum and Assessment. 22 Q And lave you ever given a deposition before? 23 A No, not that I can remember. 24 Q I think you attended 25 A Lattended. Page 7 Page 7 Page 7 Page 8 A No. I think it is straight \$92,000.00. 5 A No. I think it is straight \$92,000.00. 5 A No. I think it is 6 Q Okay. And how many months is that? 6 Q Okay. Of what? 9 A Of this year, 2019. 9 A Of this year, 2019. 9 A Of this year, 2019. 10 A How many days is your contract? 11 A Is a 12-month. 12 Q 12-month. 13 A Lour know the exact days, but excluding there a non-your accrue vacation days. So, 12. 2 Q Twelve? 2 A Uh-thuh. (Pach. So – no. You accrue vacation days. So, 12. 2 Q Twelve? 2 A Uh-thuh. Teals. So – no. You accrue vacation days. So, 12. 2 Q Twelve? 3 A Uh-thuh. A vacation day a month. 4 Q Okay. So, your nonrenewal at the district went. 4 Q Okay. So, your nonrenewal at the district went. 5 Page 8 Correct, to my best recollection of that date. 6 A Correct, to my best recollection of that date. 7 A Tworked for the State Personnel Development grant. 8 Q Twelve? 9 A Of this year, 2019. 9 Q So, Response to Intervention for? What is the name? 14 A It's a State Personnel Development grant. 15 Q Dow what? 16 A I said, I don't know the exact days. Pim sure there's a number. But it's a 12-month contract. 17 Q Twelver months, You get holidays, and you get, there's a number. But it's a 12-	5	first duly sworn, was examined and testified as	5	questions, I don't have a lot for you today, regarding
8 BY MR. KEES: 9 Q Would you state your name for the record, ma'am? 10 A Kiffany Pride. 11 Q All right. And what is your middle name. Doctor 12 Pride? 13 A Rochelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 16 Q Okay. And you work for the department? 18 Q Okay. And you work for the department? 19 A Yes. 20 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q And have you ever given a deposition before? 23 A No, not that I can remember. 24 Q I think you attended 25 A I attended. 25 A I attended. 26 Q Okay. On think it is. 27 Q S92,000.00? 28 Q S92,000.00? 29 Q S92,000.00? 30 A Yes. 40 I think ju milkely it's a straight \$92,000.00. 41 A No. I think it is. 42 Q Okay. Of what? 43 A No. I think it is. 44 Q Okay. Of what? 45 A I don't know the exact days, but excluding holidays. 46 Q Okay. Of what? 47 A I you state of this your contract. 48 Q Okay. Of what? 49 A Ush-huh. (Indicated yes.) 40 Q So. Director of Curriculum and Assessment. Who do you report to there? 40 A She is, of Learning Services. 41 Q Is she one of the assistant commissioners? 41 A She is, of Learning Services. 41 Q Is she one of the assistant commissioners? 42 Q I think you attended 43 A No, not that I can remember. 44 Q So. Director of Curriculum and Assessment. Who do you report to there? 45 A I attended. 46 A Sacy Smith. 47 A I taken you roostion there? 48 A No, not think it is straight \$92,000.00. 49 A Yes. 40 I think you attended 40 I think you attended 41 A I A Correct, to my best recollection of that date. 40 Q So, what was your first job after your nonrenewal at the district? 41 A I tworked for the State Personnel Development grant. 42 Q I carnonth. 43 A I don't know the exact days. Pin sure there's a number. But it's a I2-month contract. 44 A Ush-huh. (Indicated yes.) 45 Q Do what? 46 A I said, I don't know the exact days. Pin sure there's a number. But it's a I2-month contract. 46 Q Twelve months. You get holidays, and you get, what, ten paid days a year? 47 A Ush-hu	6	follows:	6	the lawsuit that you and three other ladies have
9 Q And the main thing is, let me finish my question before you answer so Ms. Petre can get a record. And if if you don't understand anything I ask, ask me to rephrase it. Okay? 13 A Rochelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisiana, Little Rock. 18 Q Okay. And you work for the department? 19 A Yes. 20 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q And have you ever given a deposition before? 23 A No, not that ican remember. 24 Q I think you attended. 25 A I attended. Page 7 1 A No. I think it is straight \$92,000.00. 2 Q \$92,000.00? 3 A Yes. 4 Q If's highly unlikely it's a straight \$92,000.00. 5 A No. I flink his. 6 Q Okay. Of what? 9 A Of this yeur, 2019. 10 Q How many days is your contract? 11 A It's a 12-month contract. 12 Q I Pamonth. 13 A I don't know the exact days, but excluding the holidays. 15 Q Do what? 16 A I said, I don't know the exact days, but excluding there's a number. But it's a 12-month contract. 16 Q Orwelve months. You get holidays, and you get, what, tea paid days a year? 20 A Uh-thuh, Yeah. So - no. You accrue vacation days. So, 12. 20 Q I how how how as the district went. 21 Q Okay. So, your nonrenewal at the district went. 22 Q Twelve? 23 A No. So, it was to Tie Frizer, who was the district went. 24 A Uh-thuh, Veah. So - no. You accrue vacation. 25 A I don't know the exact days, but excluding there's a number. But it's a 12-month contract. 26 Q Twelve? 27 A Uh-thuh, Yeah. So - no. You accrue vacation. 28 Q Okay. So, your nonrenewal at the district went. 29 Q Owday So, your nonrenewal at the district went. 29 Q Owday So, your nonrenewal at the district went. 29 Q Owday So, your nonrenewal at the district went. 20 Q Owday So, your nonrenewal at the district went. 21 Q Owday. So, your nonrenewal at the district went. 22 Q Twelve? 23 Q Owday So, your nonrenewal at the district went. 24 Q Owday stared that job when? 25 Q Owday. So, your nonrenewal at the district went. 26 Q Owday. So, your nonrenewal a	7	DIRECT EXAMINATION	7	filed, And you are familiar with that lawsuit?
10 A Kifflany Pride. 11 Q All right. And what is your middle name. Doctor 11 Pride? 13 A Rochelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisiana, Little Rock. 18 Q Okay. And you work for the department? 19 A Yes. 20 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q And have you ever given a deposition before? 23 A No, no that Lac an remember. 24 Q I think you attended. 25 A I attended. 26 A No. I think it is straight \$92,000.00. 27 Q \$92,000.00? 28 A No. I think it is straight \$92,000.00. 29 A Yes. 40 Q It's highly unlikely it's a straight \$92,000.00. 51 A No. I think it is. 61 Q Okay. Of what? 62 Q How many days is your contract? 63 A No, I think it is. 63 Q Okay. Of what? 64 A I attended. 65 Q Do what? 66 Q Oh, wow. Vokay. And how many months is that? 67 A I just started this job August the 8th. 68 Q Okay. Of what? 69 Q How many days is your contract? 60 Q How many days is your contract? 61 A I don't know the exact days, but excluding holidays. 62 Q Do what? 63 A I don't know the exact days. Pin sure there's a number. But it's a 12-month contract. 64 Q I what? 65 Q Do what? 66 Q Oh, whow. Vokay. And how many months is that? 76 A I just started this job August the 8th. 77 A I just started this job August the 8th. 78 Q Do what? 79 A Of Offish year, 2019. 70 Q How many days is your contract? 71 A I don't know the exact days. Pin sure there's a number. But it's a 12-month contract. 71 A I don't know the exact days. Pin sure there's a number. But it's a 12-month contract. 79 A Uh-huh. Yeah. So - no. You accrue vacation days. So, 12. 70 A Wokay. So, your nonrenewal at the district went. 71 A Universed for the State Personnel Development grant. 72 Q Do you know of consex. Lean get a record. And if you go over to the Consex. Lange and so one of the assistant commissioners? 70 A I worked for the State Personnel Development grant. 71 Q Do you know of course. Lean don't straight season. Prove of the State Personnel Development grant. 72 Q Do	8		8	A Correct.
11 if you don't understand anything I ask, ask me to rephrase it. Okay? 12 Pride? 13 A Rochelle. 14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisiana, Little Rock. 18 Q Okay, And you work for the department? 19 A Yes. 20 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q And have you ever given a deposition before? 23 A No, not that I can remember. 24 Q I think you attended. 25 A I attended. 26 Page 7 1 A No. I think it is straight \$92,000.00. 27 A Yes. 28 Q S92,000.00? 29 A Ob, wow. Okay. And how many months is that? 29 A Divistant of this job August the 8th. 29 Q Ob, wow. Okay. And how many months is that? 30 Q How many days is your contract? 31 A I don't know the exact days, but excluding holidays. 31 A I don't know the exact days, but excluding holidays. 32 Q Do what? 33 A Well, it was out of the Great Rivers Cooperative. 34 A I don't know the exact days, but excluding holidays. 35 Q Do what? 36 A No. I don't know the exact days, but excluding holidays. 36 Q Do what? 37 A I don't know the exact days, but excluding holidays. 38 Q Do what? 39 A O'this year, 2019. 40 A Ub-buh. Yeah, So - no. You accrue vacation days. So, 12. 41 C Q Twelve? 42 Q Twelve? 43 A Wh. So, it was to Tai Frazier, who was the Director of the Co-op was where I was funded through. 44 A No. So, it was to Tai Frazier, who was the Director of the department? 45 A No. So, visu sured this days a year? 46 A No. No. Wester is an office in Little Rock. 47 A John the Co-op was where I was funded through. 48 A So, it was to Tai Frazier, who was the Director of the State Personnel Development grant. 49 A Well, it was out of the Great Rivers Cooperative. 40 A Dokay. So, your nonrenewal at the district went. 40 A No. So, it was to Tai Frazier, who was the Director of the State Personnel Development grant. 40 A So, it was to Tai Frazier, who was the Director of the State Personnel Development grant. 40 A So, it was to Tai Frazier, who was the Director of the State Personnel Develo	9	Q Would you state your name for the record, ma'am?	9	Q And the main thing is, let me finish my question
12	10	A Kiffany Pride.	10	before you answer so Ms. Petre can get a record. And
A Rochelle. A Rochelle. A Rochelle. A Rochelle. A Rochelle. A And where do you live? A I failte Rock. B Q What is your address? A Yes. A Director of Curriculum and Assessment. Who do you report to there? A Yes. A Director of Curriculum and Assessment. Who do you report to there? A Yes. A Director of Curriculum and Assessment. A Yes. A Director of Curriculum and Assessment. A New Yes. A Director of Curriculum and Assessment. A No, not that I can remember. A No, I think it is straight \$92,000.00. A No, I think it is straight \$92,000.00. A No, I think it is. A	11	Q All right. And what is your middle name, Doctor	11	if you don't understand anything I ask, ask me to
14 Q And where do you live? 15 A In Little Rock. 16 Q What is your address? 17 A 1301 Louisiana, Little Rock. 18 Q Okay. And you work for the department? 19 A Yes. 10 Q What is your position there? 21 A Director of Curriculum and Assessment. 22 Q What is your position there? 23 A No, not that Lear member. 24 Q I think you attended — 25 A 1 attended. 26 Q It's highly unlikely it's a straight \$92,000.00. 27 Q \$92,000.00? 28 Q Yes. So, operating off that date. 29 Q It's highly unlikely it's a straight \$92,000.00. 30 A Yes. 40 Q It's highly unlikely it's a straight \$92,000.00. 41 A Yes, fire that date. 42 Q Okay. Of what? 43 Q Okay. Of what? 44 Q I How many days is your contract? 45 A I straight \$92,000.00. 46 A Yes, fire that date. 47 Q Okay. Of what? 48 Q Okay. Of what? 49 A Of this year, 2019. 40 Q How many days is your contract? 41 A I lord know the exact days, but excluding 14 holidays. 41 A I of the work he exact days, but excluding 15 there's a number. But it's a 12-month contract. 48 Q Twelve months. You get holidays, and you get, what, ten paid days a year? 49 A Uh-but, Yeah. So no. You accrue vacation 24 Q And you started that job when? 40 A Uh-but, Yeah. So no. You accrue vacation 24 Q And you started that job when? 41 A Uh-but, Yeah. So, your nonrenewal at the district went. 41 A lore know the exact days. I'm sure 17 there's a number. But it's a 12-month contract. 42 Q T Twelve? 43 A Uh-but, Yeah. So no. You accrue vacation 24 Q And you started that job when? 44 A Uh-but, Yeah. So no. You accrue vacation 25 Q Doy varport to Doctor Atwell? 45 A Uh-but, Yeah. So, your nonrenewal at the district went. 46 Q Okay. So, your nonrenewal at the district went. 47 A Director of Curriculum and Assessment. Who do you ureport to Doctor Atwell? 48 A Uh-but, Yeah. So no. You accrue vacation 24 Q And you started that job when?	12	Pride?	12	rephrase it. Okay?
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	Page 9		Page 10
1	Q Say it again. State Person	1	February I moved over to Learning Services for a
2	A State Personnel Development grant.	2	special project.
3	Q You started that August, roughly?	3	Q ALADE?
4	A Yes. I can't remember the exact date.	4	A Uh-huh. (Indicated yes.)
5	Q Of 2018?	5	Q So, February
6	A Yes.	6	A Well, I still was funded out of Southeast Co-op.
7	Q Through Great Rivers?	7	Q Oh, goodness.
8	A Uh-huh. (Indicated yes.)	8	A So, I moved over to the Southeast Co-op, but it
9	Q And do you remember your salary?	9	was really for a special project to work with Learning
10	A Yes. \$72,000.00.	10	Services.
11	Q Do you remember what you were making at the	11	Q Southeast Co-op in February of 2018?
12	district when you left?	12	A Uh-huh. (Indicated yes.)
13	A It was well in the 80s. 80 something, like 88.	13	Q Do you remember your salary there?
14	Q Whatever your contract was?	14	A No. It wouldn't have been of 2018. It would
15	A Something like that. I can't remember exactly.	15	have been
16	Q Yes, I've got your contract. It will reflect it.	16	Q Oh, 2019?
17	A I took a loss, I can tell you that.	17	A It would have been 2019,
18	Q When you went to Great Rivers?	18	Q Yes, this year.
19	A That's right.	19	A So, basically, it was just a lateral move, and
20	Q And I'm saying Great Rivers, but it's the State	20	the funding was just moved to a different Co-op. So,
21	Personnel Development grant?	21	it would be within that same salary.
22	A It was still Great Rivers, that's where the	22	Q \$72,000.00, whatever it would reflect?
23	funding came from.	23	A It would be within that same it was the same
24	Q And then, you were there until when?	24	pay
25	A I was there until maybe about, I want to say	25	Q And then, when did you go to your current
	Page 11		Page 12
1	position?	1	Q Are you on a Teacher Fair Dismissal contract?
2	A That was in August of 2019.	2	A No.
3		1	71 110
J	Q And so, your salary now is higher than it was	3	Q What kind of contract are y'all on?
4	Q And so, your salary now is higher than it was when you left PCSSD?	3 4	Q What kind of contract are y'all on? A I think it's at-will. I mean, it's but I
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4	when you left PCSSD?	4	Q What kind of contract are y'all on? A I think it's at-will. I mean, it's but I
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	Page 13	Page 14
1	Q What year was that?	1 table, the three blacks were not.
2	A I don't know the exact year.	2 Q Now, what were you over in the program as a
3	Q School of Innovation, who ran that?	3 program administrator?
4	A Yeah, We could go back, they will be able to	4 A Initially, I worked all literacy, because there
5	tell you when it was initiated. I'm not exactly sure.	5 was no one else there until last year when they added
6	I can't recall the date.	6 Bobette Ray. So, initially, I represented literacy,
7	Q That was under Will Reid?	7 and I also helped with social studies. There were
8	A It was under Will Reid and John Tackett.	8 only two of us to start. And then, when this
9	Q And at that time, what did you feel, or what was	9 initiative came on, there were other people added.
10	happening to you?	10 Q So, when Bobette Ray was there, what grades did
11	A I felt like I was excluded, as well as other	11 you have?
12	black women that I worked with, we were excluded from,	12 A What what?
13	number one, opportunities that other people who were	13 Q What grades did you cover?
14	involved in the initiative received, like visits to	14 A Elementary, elementary grades, and as well as 1
15	Schools of Innovation, we weren't invited. Planning	supported her in her new role for secondary, I helped
16	sessions for School of Innovation, we were not	16 her with middle school, or whatever she needed I
17	invited. However, our role would indicate that we	17 helped her.
18	would be directly involved into that initiative.	18 Q So, Ray was secondary?
19	Q So, with the School of Innovation, you weren't	19 A She was secondary.
20	invited to participate in certain activities that	20 Q Are we talking about the '17-'18 school year?
21	others were?	21 A She came in '17-'18, yes.
22	A Absolutely.	22 Q And who else was secondary as a program
23	Q And who were the others?	23 counselor?
24	A Well, there were five program administrators.	24 A As a program administrator?
25	The two white administrators were invited to the	25 Q Right.
	Page 15	Page 16
	9	1490 10
1	-	
1 2		
	A Brandy. I can't remember her last name right	1 quite a significant amount of supplementing support in
2	A Brandy. I can't remember her last name right now, I can't remember her last name right now. But	quite a significant amount of supplementing support in secondary because she was new to her role.
2	A Brandy. I can't remember her last name right now. I can't remember her last name right now. But Brandy, she was math, over math.	quite a significant amount of supplementing support in secondary because she was new to her role. Q So, as far as who was exclusively secondary, that
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	Page 17		Page 18
1	shown to be at a deficit were some of our	1	be some program administrators. There were so many
2	African-American subpopulations, specifically in our	2	occasions, I would say you probably could ask several
3	Mills feeder. And we brought that to his attention	3	people the whole floor, ask the whole floor. There
4	and it upset him, In fact, he yelled at me, and I	4	was one meeting we had with a program he brought in to
5	didn't find that to be professional. And so, things	5	be the learning management system from Utah, which
6	like that would happen. In one instance, I gave him	6	that's where they went to visit a lot. When they
7	some feedback and he told me he didn't want my	7	brought them in, we brought to his attention that
8	feedback. I said, why was I there. He said so that I	8	there were significant errors in content. He was not
9	could be able to answer the way that he is saying that	9	happy with that. There was another additional meeting
10	it's being marketed and designed.	10	of Learning Services in which he expressed his
11	Q And you said Doctor Tackett yelled at you?	11	disdainment for us to express our professional opinion
12	A Oh, yes, several occasions.	12	about it. So, we were basically not to say anything.
13	Q What did he say to you?	13	Q Did he tell you not to say anything?
14	A I mean, it's just like okay. If I say	14	A To some degree. He told us he was not asking for
15	something, it's like, "Well, I'm not asking you for	15	that. (Indicating.) "That's not what I'm here to
16	that purpose. I'm just showing you the market" he	16	tell you, I'm here to show you what is out there."
17	would yell and be, you know, like, hit the table and	17	(Indicating.) And I specifically asked him, "Are you
18	interject in that way. (Indicating.) It's just a	18	saying this has already been completed and
19	very aggressive form of communicating with me. And I	19	everything?" He said, "Yes, marketing is done,
20	would say, well, "I'm just giving my professional	20	everything is done. This is ready to go. I'm only
21	opinion and taking into consideration those things	21	informing you." (Indicating.) Which is a form of
22	that are" "we are supposed to be following," like	22	oppression and exclusion, considering I'm a literacy
23	Plan 2000.	23	person, right, and I have the tenure to have been
24	Q So, who was present during these meetings?	24	there, and I'm supporting those people who are there
25	A Jennifer was there, Bobette was there. It would	25	They would often have to come to me and ask questions.
	Page 19		Page 20
1	So, how is it that you all of a sudden I'm all of a	1	job, is to ensure that what's going forth in terms of
2	sudden excluded and I can't have a voice.	2	curriculum, resources, materials, that those things
3	Q Well, he let you tell what you thought; correct?	3	are at the benefit of all students and in
4	A No, he did not. And when I asked a question, he	4	consideration of Plan 2000, because we were under a
5	let me know he wasn't asking me that.	5	mandate that we adhere to the law.
6	Q What do you mean, he wasn't asking you that when	6	Q Was Will Reid involved in these meetings where
7	you asked a question?	7	Doctor Tackett was telling you what School of
8	A So, for example, if you are showing me School of	8	Innovation was going to do?
9	Innovation and all the marketing things going on, and	9	A He was in some instances.
10	I say, "Well, I have a question about something that	10	Q Did he ever offend you with what he said?
11	is on here. I would like to express that this may be	11	A I would say Will Reid basically let us know that
12	against Plan 2000. It may not be working to our	12	he was going to hire curriculum people in his area
13	advantage of making sure all kids are included." He	13	that could help him achieve his goal.
14	told me, "I was not asking you for that professional	14	Q Was that a problem?
15	opinion." He was telling me, "I'm only showing you	15	A It's a form of exclusion.
16	what has been done so you will be able to say what has	16	Q To hire people?
17	been done and not go against it."	17	A Okay, So, I'm already doing that so, if you
18	Q So, he was informing you on what Learning	18	know anything about education, you would know that
119	Services was going to do regarding that plan?	19	technology is an enhancement, right, it's a support.
20	A Right, Because, remember, we had been excluded.	20	okay, curriculum, technology enhances. So, the
	We were not in on planning, we were not in on review,	21	natural progression of that, which it was established
21			
21 22 23	we were not in on paining, we were not in our review, we were not in on going to visit schools, none of that. So, now you are about to launch, now you bring	22 23	that way, anyway, in terms of supporting classroom and curriculum supports, technology would do that. So.

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in the three black women that you have excluded. And

we asked questions because that's the nature of our

24

25

that would be an integration, not an exclusion.

Q So, you thought it was exclusion because he was

Page 21 Page 22 1 hiring people in his department for programming? 1 with you being black? 2 A No. I think you are mineing words here. What 2 A Okay. So, because there was a pattern 3 I'm saying is, he did not include us. It wasn't an 3 established. The three black women who -- first it 4 integrated model, which it should be. And curriculum 4 was two black women who were already there and we were 5 should always have technology integrated in, because 5 already in the midst and we had the institutional 6 it is a resource. 6 knowledge, and the one black woman added, we were the 7 Q And that's your opinion as to how that should 7 three that were excluded. 8 operate? 8 Q Who was the one added? 9 Well, you can find research to back up that 9 Nicole Townsend came in with Bobette Ray and 10 that's the best practice, and that's what we do when 10 Brandy Beckman. So, it was exclusion. 11 it comes to schools, we do evidence-based practices. 11 Q Who did Will Reid involve in his decision-making? 1.2 And you will find that. There's a lot of research 12 A He used Brandy Beckman, Leta Ray, and his three 13 that can help you with that, 13 people that he hired. And they were three white 14 Q And Will Reid, his judgment regarding that was 14 women. 15 different? 15 And those were in his department, the three white 16 A I can't speak to his judgment. What I can tell 16 women we are referring to? 17 you is that he told us what he was going to do, and 17 A Yes, 18 that's hire people to carry out his vision for that. 18 And so, aside from this one time where he said he 19 Q Okay. Well, I want to know everything that you 19 was going to hire, am I saying this right, program 20 have -- that you are complaining about. I got the 20 people for his department? 21 exclusion part. 21 A I don't know what was their direct title. It 22 A lt's a fact. I don't know, you are saying 22 would have been something like -- something with 23 "complaining". I'm expressing what happened to me as 23 instructional technology or something probably. I'm 24 a black woman. 24 not sure of the title. 25 Q Well, it was exclusion, what does it have to do 25 Q Were there other occasions where you felt like Page 23 Page 24 1 Will Reid excluded you? 1 it on what you have told me now? 2 A Well, the whole process was a combination of 2 A Okay. So, I want you to clarify your question. 3 Doctor Tackett and Will Reid working together, Okay? 3 What are you asking me exactly? Because I feel like 4 So, it was both of them working together. So, they 4 you are -- I don't know if you are trying to ask it a 5 were partners in this. 5 different way. But I'm telling you, he didn't say --6 Q Did they ever express to you that they were 6 he didn't call me like a racial slur, if that's what 7 excluding you or excluding Ms. Townsend or Ms. Beasley 7 you are asking. 8 because of your race? 8 Right. 9 No. But they did not invite us to meetings. 9 But his actions, and we know that racism is based 10 I understand that. I'm just asking, did they 10 on -- can be based on actions, he excluded us, okay, 11 ever say it was because of your race? 11 and we were not allowed to work in our capacity for 12 A No. 12 our jobs in relation to curriculum initiatives. 13 Q Okay. 13 So, if Mr. Tackett or Mr. Reid would have been 14 But you don't have to say that for it to be that. 14 black males, would you have still been offended by 15 Q Did they ever make any racial comments to you, 15 their actions? 16 either Mr. Tackett or Mr. Reid? 16 A If they would have excluded us as black women, 17 A No, not in comments. It was their actions. 17 yes. You know, they excluded us as black women. And 18 That we have just discussed? 18 the pattern was that the only people brought to the 19 I think it was exclusion and an oppression of our 19 table were white people. Would you feel excluded? 20 professional judgment and our professional right 20 Q So, even if they were black men, you are saying 21 entitled to our positions in terms of making sure that 21 you still would have felt excluded? 22 School of Innovation fit as it should according to 22 A I mean, I feel like it's a pattern of that, that 23 best practice and the law for Plan 2000. 23 that was a pattern for them, and I felt excluded as a 24 Q So I'm clear, he didn't make racial comments to 24 black woman. I don't know another way to tell you 25 you or say it was because of your race, you are basing 25 that. I felt excluded because -- I felt racism

	Page 25		Page 26
1	because I was excluded as a black women, There was a	1	around the time that we were starting the School of
2	pattern of that over time. I don't know what other	2	Innovation?
3	way to tell you that.	3	A Yeah. I think it's around that time that I began
4	Q Did you ever express your concerns regarding	4	to notice it.
5	being that you felt like you were being excluded as	5	Q Was that prior to Ms. Townsend's arrival?
6	a black woman to the HR Department?	6	A Yes, I think School of Innovation had started
7	A No.	7	before her, to my best recollection.
8	Q Why not?	8	Q And so, like I'm trying to find a timeframe.
9	A I would say maybe the first reason is because it	9	Would it have been a year before she got there?
10	took me a while to see the pattern. I knew I was	10	A I'm going to tell you, I don't know.
11	being excluded, then I saw a pattern of other black	11	Q And did it continue that last year of your
12	people being excluded. So, at some time you have to	12	employment?
13	take a step back and look at how the pattern is	13	A Oh, yeah, it was ongoing.
14	beginning to develop. Okay, so we are being excluded	14	Q And so, you did not make a complaint until you
15	as black women. Why? So, I think it took me to step	15	filed your EEOC charge?
16	back and to see all of those patterns come together.	16	A So, you mean, some type of official complaint?
17	And it was because I feel like it was because I was	17	Q Right.
18	black, a black woman with a professional opinion that	18	A Okay. No other official complaint, no.
19	they didn't value.	19	Q Did you make an unofficial complaint?
20	Q And my question was, why did you not express that	20	A Well, no. But I knew what was going on. In my
21	concern to district administrators?	21	head, I knew I was being excluded as a black woman.
22	A Well, in hindsight, you know, I just 1	22	Q I understand that, and I'm not trying to take
23	probably just didn't, in hindsight. I'm not sure	23	that away from you.
24	exactly why.	24	A No, no, no, no.
25	Q So, the first time you felt this exclusion was	25	Q So, as far as complaints, no?
	Page 27	1	Page 28
1	A No.	1	Q But he never used those words?
2	Q Any other individuals in the district that you	2	A To some degree, he did. It was an exclusion to
3	have complaints, concerns, grievances, disputes with?	3	curriculum; right?
4	I need to know anything regarding other district	4	Q These are the Board minutes that you were I
5	members as relates to your lawsuit.	5	don't know. Did you record them?
6	A Okay. So	6	A I have recorded several sessions, yes.
7	Q So, do you want me to explain that, because it's	7	Q So, we would know what he said; correct?
8	pretty loaded,	8	A Yeah. He basically said they told him what to
9	A Yes, I need you to tell me what you mean.	9	do. So, he was part of the plan. I mean, he was part
10	Q You told me your complaints about Will Reid in	10	of it.
11	regard to race, and John Tackett in regard to race.	11	Q Any other complaints against Paul Brewer in
12	A Uh-huh, (Indicated yes.)	12	regards to race?
13	Q Do you have any complaints against Paul Brewer?		A I mean, I think that's significant enough.
14	A I think he was part of it. I think he was part	14	Q So, that's a "no"?
15	of it, He helped them carry this out. They met	15 16	A I would say that is inclusive of just all of his actions. So, that would be the end of it.
16	together. He told us that in a Board meeting that he	17	
17	met with them and they gave him marching orders to get	18	
18	rid of us.		complaints about in regards to race?
19	Q Paul Brewer at a Board meeting	19	A I'm not sure exactly how Doctor McNulty played a
20	A Yes.		role, but he seemed to fit right into their plan. He
21	Q you said that he what?	21	came right in in April and met with us before he was
22	A He said he met with those two individuals	22	superintendent and basically went along with
23	Q Tackett?	23	everything.
	A Tackett and Reid and was charged with getting	≥ 4	Q What do you remember from the meeting you had
24 25	rid of us, which was to cut us, to target us.	25	with Doctor McNulty?

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1	A He told us that this was part of his decision,	1	BY MR. KEES:
2	that but that he was going to try to restructure,	2	Q Why did you record the meeting with Doctor
3	and that if the strategist positions were still there,	3	McNulty?
4	that we would be recalled to those, because by law, if	4	A Because at that time I had already I had come
5	it's the same position, it's still there, we would be	5	to the conclusion that we were being excluded and that
6	recalled, and that he had other positions that he was	6	we were being targeted. And so, I was just
7	restructuring. But he totally admitted that he was	7	distrustful. And number one, he was not even the
8	helping them to eliminate or restructure.	8	superintendent at that time, so I didn't understand
9	Q Learning Services?	9	why he was meeting with us. We had a superintendent.
10	A Well, he didn't really say Learning Services, he	10	Q Did you understand that he was going to be the
11	really just talked about the five of us.	11	superintendent?
12	Q The five program administrators?	12	A I'm clear about that, but I'm also clear about
13	A Uh-huh. (Indicated yes.)	13	the law that he should not have been there at that
14	Q Did you record any meetings with Doctor McNulty?	14	time because he wasn't the superintendent, not to be
15	A I did.	15	giving us directions about our jobs.
16	Q Okay. Have you provided those?	16	Q Was he giving you directions or was he
17	A I did.	17	A He kind of was. He gave us directions to create
18	MR. KEES: I will check, Joy, and see if	18	like a spreadsheet of what it is that we do, how we
19	I have I know I got recordings from Board	19	contribute. He basically was sort of like
20	meetings.	20	interviewing us.
21	THE WITNESS: You've got those	21	Q Was he trying to understand what you did in that
22	recordings.	22	position?
23	MS, SPRINGER: Yes, I sent those to you.	23	A You would have to ask him that.
24	THE WITNESS: You've got it.	24	Q So, he asked you to create a spreadsheet as to
25	MR. KEES: You may have.	25	what you did?
	Page 31		Page 32
1	A It was like an interview, basically. And he let	1	A Well, he gave us I mean, he told that he might
2	us know it was basically like an interview. He	2	do that. But he said those were going to be the same
3	basically let us know.	3	positions and that he did not intend for us to
4	Q Did you interview for the two positions that came	4	interview for those if those were the same positions.
5	back open in the program instructional strategists?	5	Q Okay.
6	A No.	6	A So, that's why. That's something he also
7	Q Why did you not interview for those positions?	7	articulated in April.
8	A Because, by law, there should have been a recall.	8	Q And then, did you meet with him again after the
9	Why would I interview for that?	9	April meeting?
10	Q Well, once you found out that you weren't	10	A Yeah. I think it was like maybe a May 1st, I'm
11	recalled and that you had to interview, why did you	11	not sure the exact date, but it was something like
12	choose not to interview?	12	that, a couple of days later.
13	A Because I thought, by law, I should have been	13	Q After you had been nonrenewed?
14	recalled. Why would I do that if, by law, I'm	14	A Uh-huh. (Indicated yes.)
15	supposed to be recalled? Why would I do that?	15	Q And what did he tell you at that meeting?
16	Q Well, if you are right and the district wasn't	16	A Basically the same message. I mean, it wasn't
17	going to recall you, why did you not interview?	17	really a different message. It was again explaining
18	A Because, by law, they should have. They should	18	his plan to restructure.
19	have recalled us, by law.	19	Q And did you see the two new positions? Do you
20	Q At what point did you know at what point did	20	know what they were called?
21	you learn they were not recalling you for the	21	A Something like a strategist or something.
22	position?	22	Q It had a different title?
23	A I mean, not until after they didn't do it.	23	A It had a different title, but he said they
24	Q So, when did you learn that there were going to	24	basically would be the same.
			•
25	be two new positions that Doctor McNulty had created?	25	Q Did you see those when they were posted online?

	Page 33		Page 34
1	A I saw them at some point. I'm not sure exactly	1	were going to recall you?
2	when.	2	A I didn't just what do you mean, "just wait"?
3	Q What action did you take when you saw those?	3	Q Well, we know you weren't you knew they
4	A I don't understand your question.	4	weren't going to recall you. So, I'm asking why you
5	Q What do you not understand?	5	didn't apply?
6	A What action? I don't understand what you mean,	6	A Because I was not why would I apply for
7	"what action".	7	something we're supposed to be recalled for? Can you
8	Q Did you call anybody and say, "I'm interested"?	8	explain that to me?
9	Did you send a letter, did you send an e-mail?	9	Q Well, I think we can all agree that there was no
10	A No. Why would I do that? It was supposed to be	10	recall.
11	I should have been recalled for that.	11	A But it should have been. Can we agree on that?
12	Q So, you were just waiting for Shawn Burgess to	12	Q No, I'm not I'm just asking questions
13	call you?	13	A Okay. Well, I'm just asking you can we agree on
14	A No.	14	that
15	Q Well, how does a recall work?	15	Q No. Because it was a different position.
16	A A recall would be yeah, I would get some	16	A Okay. Well, that's not what he said.
17	notification. And you are naming Shawn, but Shawn was	17	Q Nicole Townsend applied Do you know that?
18	involved in this process. It was Paul Brewer that	18	A She told me she did.
19	came to us and told us this. So, it wouldn't have	19	Q So, you thought it was going to be a recall, but
20	been Shawn Burgess, anyway.	20	you didn't call anybody at central office to get
21	Q Well, you were waiting for Paul Brewer to call	21	information on the position?
22	you?	22	A Doctor McNulty told me when he met with us that
23	A Well, basically, or Doctor McNulty, as he said,	23	he did not have any first of all, Bobette asked him
24	we would be recalled.	24	would we have to apply for those positions, and he
25	Q So, you were just waiting did you think they	25	said, "My intention is not for you to do that, because
	Page 35		Page 36
1	they would be the same thing that you are doing now."	1	posted?
2	He said, "I'm not sure how many of those we would	2	A Okay. We just said that. I mean, I'm confused
3	have." But again, it goes backs to if he had	3	about the question, because you just asked me that.
4	intentions of three, if he would have brought three,	4	Q You shouldn't be confused about that.
5	the state of the s		`
~	he would have brought probably three black women back.	5	A I'm confused that you keep asking me the same
6	Again, there is another pattern.	5	•
			A I'm confused that you keep asking me the same
6	Again, there is another pattern.	6	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the
6 7	Again, there is another pattern. Q He told you his intention was to bring those	6 7	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date.
6 7 8	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed?	6 7 8 9 10	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening?
6 7 8 9	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed? A Well, he was pretty sure that he had leverage,	6 7 8 9 10	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening? A That's the only way it would be posted.
6 7 8 9	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed? A Well, he was pretty sure that he had leverage, that he needed to see what number he could bring back.	6 7 8 9 10 11	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening? A That's the only way it would be posted. Q Okay. So, when you saw it, it was available for
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6 7 8 9 10 11 12 13 14 15	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed? A Well, he was pretty sure that he had leverage, that he needed to see what number he could bring back. He was pretty sure. Q But it wasn't confirmed at that point how many? A He was pretty sure, that's what I will tell you. Q But then, ultimately, you are aware that two new positions were created? A Like what? Q Instructional strategists, the ones that you just	6 7 8 9 10 11 12 13 14 15 16	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening? A That's the only way it would be posted. Q Okay. So, when you saw it, it was available for people to apply? A It was a position posted on the website. Q And you just said that it's only posted if it's open? A It was posted on the website. That's how I'm
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed? A Well, he was pretty sure that he had leverage, that he needed to see what number he could bring back. He was pretty sure. Q But it wasn't confirmed at that point how many? A He was pretty sure, that's what I will tell you. Q But then, ultimately, you are aware that two new positions were created? A Like what? Q Instructional strategists, the ones that you just named. A Well, they are not really new, they were renamed. They were the same thing we did, I was aware of that. Q Have you seen the job description?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening? A That's the only way it would be posted. Q Okay. So, when you saw it, it was available for people to apply? A It was a position posted on the website. Q And you just said that it's only posted if it's open? A It was posted on the website. That's how I'm going to answer that. You know, yes, you know the answer to that. Yes. Q And you chose not to apply? A Why would I
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Again, there is another pattern. Q He told you his intention was to bring those back, but he didn't tell you anything was confirmed? A Well, he was pretty sure that he had leverage, that he needed to see what number he could bring back. He was pretty sure. Q But it wasn't confirmed at that point how many? A He was pretty sure, that's what I will tell you. Q But then, ultimately, you are aware that two new positions were created? A Like what? Q Instructional strategists, the ones that you just named. A Well, they are not really new, they were renamed. They were the same thing we did. I was aware of that, Q Have you seen the job description? A When I saw it on the website, I saw it. Q So, you have seen it? A Uh-huh, it's the same thing.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A I'm confused that you keep asking me the same question over and over again. Okay. I saw it on the website, yes. Q And when did you see it posted? A I'm not sure the exact date. Q But it was posted as an opening? A That's the only way it would be posted. Q Okay. So, when you saw it, it was available for people to apply? A It was a position posted on the website. Q And you just said that it's only posted if it's open? A It was posted on the website. That's how I'm going to answer that. You know, yes, you know the answer to that. Yes. Q And you chose not to apply? A Why would I Q That's a "yes" or "no". You chose not to apply; correct? A I shouldn't have had to apply for a job that I
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1 Q You chose not to apply? 2 A I don't know what you mean by I chose not to apply for a job I already had. 4 Q Now, is there like when you see the posting, and I don't know this, you click on it and do an application? 5 and I don't know this, you click on it and do an application? 6 Q You want to be hostile, that's fine. 7 A There is a way to click a button and apply. 8 Q You did not click that button? 9 A I did not for a job I already had, that I was supposed to be recalled for. 10 O Did you have it when you were nonrenewed as of June 30th? 11 A I don't understand the question. 12 June 30th? 13 A I don't understand the question. 14 Q Well, you didn't have a job after June 30th. 15 A Okay. Yeah. 16 Q You admit that? 17 A Well, you know, we just talked about that, as of June 30th, my job that job was RIFed. 19 Q Right. Or it ceased. You didn't have that job? 10 A Yeah. 21 MR. WALKER: She answered it. 22 THE WITNESS: I have answered it so many times. You asked me the same question like 24 I 5 times in a row. 25 MR. WALKER: She has answered it. 26 What do you mean "tried"?	10 01 15
2 A I don't know what you mean by I chose not to apply for a job I already had, 4 Q Now, is there like - when you see the posting, and I don't know this, you click on it and do an application? A There is a way to click a button and apply. Q You did not click that button? A There is a way to click a button and apply. Q You did not for a job I already had, that I was supposed to be recalled for. Did you have it when you were nonrenewed as of long to be recalled for. Q You define to for a job I already had, that I was supposed to be recalled for. Did you have it when you were nonrenewed as of long to be recalled for. Q I mean, I do this for a living so it doesn bother me. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. A Ckay Com	Page 38
2 A I don't know what you mean by I chose not to apply for a job I already had, 4 Q Now, is there like - when you see the posting, and I don't know this, you click on it and do an application? A There is a way to click a button and apply. Q You did not click that button? A There is a way to click a button and apply. Q You did not for a job I already had, that I was supposed to be recalled for. Did you have it when you were nonrenewed as of long to be recalled for. Q You define to for a job I already had, that I was supposed to be recalled for. Did you have it when you were nonrenewed as of long to be recalled for. Q I mean, I do this for a living so it doesn bother me. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. Q I can take a break if I want to. A Ckay Come on. A Ckay Com	
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25 A Well, okay. So, Doctor McNulty told us those 25 A Yes,	

	Page 41		Page 42
1	Q So, as far as Deputy Superintendent, did you	1	A Well, it had to be well after August. It had to
2	submit the application?	2	be into August, I think, those positions were hired.
3	A Yes.	3	Q Okay.
4	Q And then, did you withdraw your application?	4	A It was after I had yeah.
5	A I think at some point, yes.	5	Q After you had started working for the grant
6	Q Prior to the selection?	6	program?
7	A I can't remember if it was prior to selection.	7	A Yes.
8	I'm not sure. I can't remember.	8	Q Even if the positions were paying more?
9	Q Did you ever get a call about an interview?	9	A What positions?
10	A Huh-uh, no	10	Q Like the Deputy Superintendent, if it was paying
11	Q Okay I guess I'm just not clear on this one.	11	more than \$72,000,00?
12	Did you want the Deputy Superintendent position, but	12	A Well, I didn't know the pay at the time.
13	then you gained other employment?	13	Q Okay. Any other positions that you applied for,
14	A Yes.	14	besides Deputy Superintendent, Federal Programs, and
15	Q This one through the Co-op?	15	then the conversation we had about
16	A Yes.	16	A In Pulaski County?
17	Q So, you then chose you didn't want to go	17	Q Yes.
18	forward with the Deputy Superintendent?	18	A That's it.
19	A Yes, at that time.	19	Q Before you took the job with Great Rivers, or the
20	Q And then, Federal Programs, the same thing?	20	State Personnel Development grant, did you have other
21	A Yes, at the time.	21	job offers?
22	Q What do you mean "at the time"?	22	A Before I took no.
23	A You said I didn't want to move forward with the	23	Q Okay. So, your background, where did you
24	position, I said, "Yes, at that time,"	24	graduate high school?
25	Q Which would have been the summer of 2018?	25	A Sylvan Hills.
1 2	Q And what year was that? A '92.	1 2	School District? A In 2012. I think 2012.
3		3	
4	Q And your college was where? A Hendrix.	4	Q What was your first position? A It was a program administrator.
5	Q What, '96?	5	
6	A '96.	6	Q So, the position you always held? A Uh-huh. (Indicated yes.)
7	Q And your Masters was?	7	Q So, of the six or of the five program
8	A I have two Masters. One was at UALR, and then	8	administrators that were nonrenewed, were you there
9	one I got online at Walden.	9	the longest?
10	Q What is the one at UALR?	10	A Yes.
11	A Middle childhood education.	11	Q After your second meeting with Doctor McNulty
12	Q What year was that?	12	that you described earlier, sometime around May 1,
13	A I don't know the exact year. It had to be early	13	have you had any other conversations with him?
14	2000s, something like that.	14	A General. I have seen him in passing, general
15	Q What was the other Masters?	15	conversations, "Hello, how are you?" That's it.
16	A It's in reading and literacy.	16	Q Do you do any work with Pulaski County through
17	Q At which?	17	the department?
18	A At Walden.	18	A I have not.
19	Q And then, where is your doctorate?	19	Q Would you have the occasion to in your position?
20	A My doctorate is from Harding	20	A It could come up. it could.
21	Q What is that? What year did you obtain that?	21	Q Do you have communication with anybody at the
22	A 2017.	22	district regularly?
23	Q What is that in?	23	A You mean, in terms of what?
	A Educational Leadership.	24	Q Like who from the district contacts you? Do you
24			
24 25	Q And when did you go work for the Pulaski County	25	have contact with particular positions?

Page 45 Page 46 1 A Probably no. No, not in that direct way. So, 1 she told me, "No." 2 2 there would be people maybe that work under me that Did she say anything else about the decision? 3 might have direct contact. 3 She told me it wasn't her decision. That was the 4 Q Okay, And you had a meeting with Paul Brewer 4 basis of our conversation. 5 5 with all the other administrators where he first said Was there anybody else there when you had that 6 that the allocations were going not to include your conversation? 7 position? 7 No. I mean, I have heard her say it publicly in 8 Α Yes. 8 Board meetings, too, as well. 9 Did you ask questions at that meeting? 9 Q Okay. 10 10 A I don't think I asked any questions. I pretty So, in that regard, yes, 11 much listened. 11 Did you have any conversations with any Board Q 12 And then, you were at the Board meeting, the next 12 members about your position being cut? 13 13 meeting where --No, I have never come in contact with Board 14 Yes. 14 members about my position being cut. 1.5 -- your position was cut? 15 Well, you had a hearing; correct? Q 16 16 A Yes Yes. But I'm saying, I thought you meant like 17 Q You were there? 17 individually. 18 18 That's what I did mean. That's what I was Λ 19 Q Did you have discussions with Doctor Warren about 19 asking, you had a hearing? 20 this? 20 I did have a hearing. 21 21 Α About --Okay, Just to make sure I'm clear on this, I had 22 22 Q The position being cut? asked you about any complaints or issues regarding 23 23 RIFed. So, I did ask her -- I mean, I have race, and we talked about Mr. Reid, Mr. Tackett, Mr. 24 24 talked to her about it when I was working there. And Brewer, and then you gave me your general concerns. 25 25 I basically asked her was it her recommendation, and Am I missing any individuals at PCSSD that you have Page 47 Page 48 1 any complaints or issues with while you were there No children. 2 regarding race? 2 You are not currently married? 3 3 No, I can't remember, I can't think of anybody 4 else. Those were the people I felt like were part of 4 Do your parents live in the area? 5 5 Yes. My mother lives in Little Rock and my 6 Q And did you ever file a district grievance of any 6 father lives in Little Rock. 7 7 sort regarding anything? What are their names? 8 District grievance, no. 8 Dorothy Williams and Eddie Pride. 9 9 But this lawsuit, this is the only litigation you Is Dorothy Williams -- where does she live? 10 have been involved in? 10 Α She lives in Little Rock, right here in Little 11 Yes. 11 Α Rock. 12 12 So, your entire tenure at the district you were She is not the Board member at North Little Rock? 13 located in central office? 13 No, she doesn't -- no, she is retired. She 14 Λ Yes. 14 doesn't do anything like that. 15 15 Who was your supervisor before Tackett? Do you have siblings in Little Rock? 16 So, Doctor Warren, when she was elementary, and 16 Α No. 17 17 then -- okay. So, I also had Doctor Remele, Doctor Have you had any medical treatment related to 18 Warren. I'm trying to see who else. What is her name 18 your Complaint against the district? 19 that was temporary? I can't think of her name right 19 Α 20 20 Well, we all have doctors. 21 Was it Goodwin? 21 Q Yeah, I have been to the doctor. 22 Yeah, Ms. Goodwin. 22 I'm asking, have you seen a doctor specifically Α 0 23 And you are divorced from Kenneth Davis? 23 related to --24 24 Yes. 25 And no children? 25 Well, let me just make sure I'm clear. Have you 0

	Page 49		Page 50
1	seen a doctor specifically related to your Complaints	1	Q Do you have any dependents?
2	against the district in regards to this lawsuit?	2	A No.
3	A No.	3	Q I see an e-mail, it says, "Doctor Warren, I sent
4	Q Did you ever file for unemployment following the	4	Kim White an e-mail, she did not respond, and this
5	nonrenewal?	5	morning I spoke with Ms. Burgess and she stated that
6	A Yes.	6	we do not qualify for the position." And this is
7	Q But that was only, what, a few did you get	7	referencing an elementary principal position?
8	unemployment?	8	A Uh-huh (Indicated yes.)
9	A No. No.	9	Q Earlier, you told me Kim White
10	Q Because you gained the other employment, or you	10	A She did initially tell me that.
11	were denied?	11	Q Okay.
12 13	A Well, basically, you have to wait so many weeks before you can get unemployment. And at that time, l	13	A Then I had to go verify.
14	had been contracted but not paid, but it still didn't	14	Q And you verified that with Ms. Burgess? A Yes.
15	matter. So, you just have to go without pay.	15	Q Did you disagree with that?
16	Q How did you strike that.	16	A Do I disagree with me not being able to apply?
17	You were without pay for roughly a month and a	17	Q Yes.
18	half?	18	A Yeah. I don't think it should be a
19	A Probably a little longer than that, because it	19	pre-qualification, no, to be an assistant principal.
20	takes you like three weeks to get paid on your current	20	Q Okay
21	position.	21	A So, yeah, I did disagree with that.
22	Q And what did you do to get by during that time?	22	Q And I understand that. You agree that that was a
23	A I had to depend on people that like I had to	23	qualification for PCSSD?
24	acquire some debt, and depend on people to help me	24	A Right.
25	that were close to me.	25	Q So, what is your licensure?
1	Page 51 A It's I have several licensures. So, K-8,	1	Page 52 Q And you went back to teaching?
2	middle school English, curriculum program	2	A For a year, yes.
3	administrator, building level administrator, I have a	3	Q At an elementary school?
4	coaching endorsement on there. I'm trying to see what	4	A Middle.
5	else I've got on there. That about sums it up.		
6	O What man was miasta samins to DCCCD0	5	Q Middle school. Okay. So, the complaints that we
	Q What were you prior to coming to PCSSD?	6	have discussed today were based on your race. Any
7	A I worked in the Little Rock School District as a	6 7	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the
8	A I worked in the Little Rock School District as a teacher.	6 7 8	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment
8 9	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level	6 7 8 9	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age?
8 9 10	 A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? 	6 7 8 9 10	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age?
8 9 10 11	 A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little 	6 7 8 9 10	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right.
8 9 10 11	 A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. 	6 7 8 9 10 11 12	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No.
8 9 10 11 12 13	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. Q I thought you were a teacher?	6 7 8 9 10 11 12 13	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No. Q And would it be fair you also had complaints
8 9 10 11 12 13	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. Q I thought you were a teacher? A Well, that's the job I had prior to coming. But	6 7 8 9 10 11 12 13	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No. Q And would it be fair you also had complaints regarding your gender, because you said "black women"?
8 9 10 11 12 13 14	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. Q I thought you were a teacher? A Well, that's the job I had prior to coming. But I had several positions in Little Rock. I worked	6 7 8 9 10 11 12 13 14 15	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No. Q And would it be fair you also had complaints regarding your gender, because you said "black women"? A Yes, I feel like gender was part of it. I think
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8 9 10 11 12 13 14 15	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. Q I thought you were a teacher? A Well, that's the job I had prior to coming. But I had several positions in Little Rock. I worked there 15 years. Q So, you went from a building level or a	6 7 8 9 10 11 12 13 14 15	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No. Q And would it be fair you also had complaints regarding your gender, because you said "black women"? A Yes, I feel like gender was part of it. I think gender, as well, in addition to. Q Any complaints about your religion?
8 9 10 11 12 13 14 15 16	A I worked in the Little Rock School District as a teacher. Q So, you have never been a building level administrator? A No. I worked for the district level in Little Rock, but not a building level administrator. Q I thought you were a teacher? A Well, that's the job I had prior to coming. But I had several positions in Little Rock. I worked there 15 years. Q So, you went from a building level or a district administrator back down to a teacher?	6 7 8 9 10 11 12 13 14 15 16	have discussed today were based on your race. Any other complaints that you had while at PCSSD in the last in the five years prior to your employment based on age? A On age? Q Right. A No. Q And would it be fair you also had complaints regarding your gender, because you said "black women"? A Yes, I feel like gender was part of it. I think gender, as well, in addition to. Q Any complaints about your religion? A No religion.
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	Page 53	Page 54
1	A Yes.	1 Q Yes, regarding this nonrenewal?
2	Q At 14 percent?	2 A No, I don't really remember that.
3	A Yes.	3 Q All right. Have you understood everything I have
4	Q Did you get a Teacher Retirement contribution	4 asked today, ma'am?
5	when you were at Great Rivers and Southeast?	5 A Yes.
6	A Yes.	6 MR. KEES: All right, Thank you for
7	Q And who is your supervisor Stacy Smith, you	7 your time.
8	told me?	8 THE WITNESS: Thank you.
9	A Yes.	9 (WHEREUPON, at 1:20 p.m., the taking of
10	Q Just so I'm clear. On Brewer, when you had the	10 the above-entitled deposition was concluded.)
11	first conversation and he advised that these cuts were	110
12	going to be part of the allocations, did he give you	12
13	any information about other positions at that time,	13
14	open positions?	14
15	A No. He said he wanted to give he wanted to	15
16	give Doctor McNulty an opportunity to restructure.	16
17	So, he said we wouldn't know anything until Doctor	17
18	McNulty came and met with us.	18
19	Q Was Laura Shirley in that meeting with you?	19
20	A I don't think so. I think it was the five	20
21	program administrators, is my best recollection of	21
22	that.	22
23	Q Do you ever remember being in a meeting with	23
24	administration and Ms. Shirley being present?	24
25	A You mean, regarding the RIF?	25
	Page 55 ERRATA PAGE\LINE SAYS: SHOULD SAY:	Page 56 SIGNATURE 1, Kiffany Pride, do hereby certify that I have read the foregoing pages, and the same is a true and correct transcription of the proceedings that occurred, except for the corrections (if any) that appear on the Errata Sheet. Kiffany Pride
		STATE OF ARKANSAS)) ss.:
		COUNTY OF)
		WITNESS MY HAND AND SEAL, this
		day of, 2019.
		NOTARY PUBLIC
		MY COMMISSION EXPIRES
	55	56

Page 57 Page 58 CERTIFICATE with the action, and have no interest in the outcome or results of this litigation. STATE OF ARKANSAS) WHEREFORE, I have subscribed my signature and) ss.: COUNTY OF PULASKI) affixed my notarial seal as such notary public at the I, DEBBYE L. PETRE, Certified Court Reporter City of Little Rock, County of Pulaski, State of Arkansas, this the 12th day of November, 2019. in and for the County of Pulaski, State of Arkansas, duly commissioned and acting, do hereby certify that the witness herein was by me first duly sworn to DEBBYE L. PETRE, CCR testify the whole truth and nothing but the truth NOTARY PUBLIC IN AND FOR prior to taking down in Stenotype the questions, PULASKI COUNTY, ARKANSAS answers, and proceedings during said deposition, and from such recordation was thereafter reduced to print by means of computer-assisted transcription, and the ---0--same fully, truly, and correctly reflects the proceedings had. I FURTHER CERTIFY that the above deposition was given by the witness and taken at the times and in the place hereinabove set forth. I FURTHER CERTIFY that I am not attorney or counsel of any of the parties, nor am I relative or employee of any attorney or counsel or party connected 58 57